

# EXHIBIT 13

## Christopher Markos

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**From:** Elizabeth L. Kramer <ekramer@laverylaw.com>  
**Sent:** Monday, March 21, 2022 9:37 AM  
**To:** Christopher Markos  
**Cc:** Rich Raiders; Mindy S. Kushner; Aimee Paukovits; Frank J. Lavery, Jr.  
**Subject:** RE: Gerhart

Chris,

I apologize, but my office needs at minimum another week to get you the document production. Going through the extensive emails has taken more time than we anticipated and the paralegal working on this file is out this week, which created some issues with our ability to get this done.

Otherwise, I wanted to let you know that we will be serving as Mr. Rice's counsel for his upcoming deposition. Since he was served with your subpoena, he made contact with our client. Additionally, Mr. Rice advised us that he is scheduled to be out of the country the week of his scheduled deposition. You can go through my office to find a new date that will work for Mr. Rice.

Additionally, Aimee or Mindy from my office will be in touch about scheduling the depositions of the TigerSwan employees.

Thanks,

**Elizabeth L. Kramer, Esquire**  
**Lavery Law**

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**From:** Elizabeth L. Kramer  
**Sent:** Wednesday, March 16, 2022 3:49 PM  
**To:** 'Christopher Markos'; Frank J. Lavery, Jr.  
**Cc:** Rich Raiders; Mindy S. Kushner; Aimee Paukovits  
**Subject:** RE: Gerhart

Okay, we will work with the various witnesses and provide you with some dates. We can also get you a date for the designee deposition, but I am hoping you can provide us with a revised notice based on the documents you receive, and the Court's Order on the scope of discovery.

Thanks,

**Elizabeth L. Kramer, Esquire**

**Lavery Law**

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**From:** Christopher Markos [mailto:[cmarkos@williamscedar.com](mailto:cmarkos@williamscedar.com)]  
**Sent:** Wednesday, March 16, 2022 3:40 PM  
**To:** Elizabeth L. Kramer; Frank J. Lavery, Jr.  
**Cc:** Rich Raiders; Mindy S. Kushner; Aimee Paukovits  
**Subject:** RE: Gerhart

A few days is fine for the documents.

I don't have a strong preference on doing a designee first or last. But I would like to at least put it on the calendar, especially since there are a lot of calendars to coordinate. Right now, I have nothing in April that can't be moved.

Christopher Markos, Esq.

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[NOTE OUR NEW ADDRESS](#)

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**From:** Elizabeth L. Kramer <[ekramer@laverylaw.com](mailto:ekramer@laverylaw.com)>

**Sent:** Wednesday, March 16, 2022 3:34 PM

**To:** Christopher Markos <[cmarkos@williamscedar.com](mailto:cmarkos@williamscedar.com)>; Frank J. Lavery, Jr. <[flavery@laverylaw.com](mailto:flavery@laverylaw.com)>

**Cc:** Rich Raiders <[rich@raiderslaw.com](mailto:rich@raiderslaw.com)>; Mindy S. Kushner <[MKushner@laverylaw.com](mailto:MKushner@laverylaw.com)>; Aimee Paukovits <[apaukovits@laverylaw.com](mailto:apaukovits@laverylaw.com)>

**Subject:** RE: Gerhart

Chris,

I was going to e-mail you today. We need a few more days to finalize our document responses. We should be able to get them to you next week. Please let me know if this is ok.

For the TigerSwan depositions, we have a letter that should be going out to you soon about that, but long story short, we are going to be representing everyone absent Porter and McKinnon. Please provide us with proposed dates for the depositions.

For the designee deposition, I was under the impression that you were tabling that until you received our document request responses and took the depositions of the individual employees and/or former employees because they may eliminate the need for a designee deposition?

Please let me know if you have any questions.

Thanks,

**Elizabeth L. Kramer, Esquire**

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**From:** Christopher Markos [<mailto:cmarkos@williamscedar.com>]  
**Sent:** Wednesday, March 16, 2022 3:28 PM  
**To:** Frank J. Lavery, Jr.; Elizabeth L. Kramer  
**Cc:** Rich Raiders  
**Subject:** Gerhart

Frank and Elizabeth,

Any update on (1) document production; (2) scheduling the 30(b)(6); (3) the availability of other witnesses I identified in my 2/1 letter? I think I can refine the additional individual witnesses after the 30b6, but we are going up against the clock and should get our proverbial ducks in a row.



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